

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RICHARD P. by and for)	No. 03-390 Erie
RACHEL P. and DENISE L. by)	
and for KRISTINA L.,)	
)	
Plaintiffs,)	
)	
v.)	Jury Trial Demanded
)	
SCHOOL DISTRICT OF THE CITY)	Electronically Filed
OF ERIE, et al)	
)	
Defendants.)	

PLAINTIFFS' MOTION TO SEAL THE RECORD AND
SUPPLEMENT THEIR PRETRIAL STATEMENT

1. Plaintiffs' complaint alleged violation of rights secured to them under Title IX of the Education Act, stemming from the failure of the Erie School District to address or curtail sexual harassment and sexual assault. The harassment was perpetrated on Plaintiffs them by other students. The complaint also alleges that the School District further violated Title IX by removing them from regular schooling and placing them in an alternative education program to correct their behavior.

2. Plaintiffs have secured services of a forensic psychologist to review the Plaintiffs' damages and prepare a report. The report has been delayed until all deposition transcripts and documents were received and because of the complexity of the medical records.

3. Plaintiffs request this Court enter an Order permitting them to supplement their pretrial statement with the report, and to cause the supplement to the pretrial statement to be sealed because it contains highly personal and confidential psychological information.

4. Defendants do not object to this motion

WHEREFORE, Plaintiffs request this Court enter an Order permitting them to supplement their pretrial statement with their expert report, and to seal the report.

Respectfully submitted,

s/ Edward A. Olds
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CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2005, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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S/ Edward A. Olds
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